

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEW JERSEY

3 CIVIL ACTION NO.
4 MDL 864

5 IN RE:

6 DONALD J. TRUMP
7 SECURITIES LITIGATION,

8 ORAL DEPOSITION OF
9 MARVIN ROFFMAN

10 * * * * *

11 WEDNESDAY, SEPTEMBER 25, 1991

12 * * * * *

13 TRANSCRIPT IN THE ABOVE MATTER TAKEN
14 AT THE OFFICES OF SCHWARTZMAN & HEPPS, 2033 WALNUT
15 STREET, PHILADELPHIA, PENNSYLVANIA, COMMENCING AT
16 10:00 A.M.

17 A P P E A R A N C E S:

18 BERGER & MONTAGUE, ESQUIRES
19 BY: TODD S. COLLINS, ESQUIRE
20 AND
21 CLAY W. HAMLIN, III, ESQUIRE
22 ATTORNEYS FOR THE PLAINTIFFS

23 CERTIFIED SHORTHAND REPORTING SERVICES
24 ARRANGED THROUGH
25 MASTROIANNI & FORMAROLI, INC.
 104 WHITE HORSE PIKE
 HADDON HEIGHTS, NEW JERSEY 08035
 (609) 546-1100

1 OCCASION TO, AT ANY TIME, LOOK AT THE PROSPECTUS
2 FOR THAT OFFERING?

3 A. YES.

4 Q. I'M GOING TO ASK YOU TO TAKE A LOOK AT A
5 DOCUMENT THAT'S BEEN PREVIOUSLY MARKED AS WEBB-2.

6 (OFF-THE-RECORD DISCUSSION)

7 BY MR. COLLINS:

8 Q. HAVE YOU SEEN THIS DOCUMENT BEFORE?

9 A. YES.

10 Q. AND THIS IS, IN FACT, A PROSPECTUS?

11 A. YES.

12 Q. DID YOU LOOK AT THIS DOCUMENT OR A RED
13 HERRING IN SOME -- AT SOME POINT IN OR PRIOR TO
14 NOVEMBER, 1988?

15 A. YES.

16 Q. IN NOVEMBER, 1988, DID YOU MAKE ANY
17 RECOMMENDATIONS TO ANYONE AS TO WHETHER OR NOT IT
18 WAS A GOOD IDEA TO BUY THESE BONDS?

19 A. YES.

20 Q. AND DID YOU MAKE THOSE RECOMMENDATIONS IN
21 NOVEMBER OF '88 OR BEFORE NOVEMBER OF '88?

22 A. IN 19 -- IN NOVEMBER OF 1988.

23 Q. AND TO WHOM DID YOU MAKE THESE
24 RECOMMENDATIONS?

25 A. TO THE SALES FORCE OF JANNEY, MONTGOMERY,

1 SCOTT.

2 Q. AND IN WHAT FORM WERE THOSE RECOMMENDATIONS?

3 A. THE SPOKEN WORD.

4 Q. WHAT WERE THOSE RECOMMENDATIONS?

5 A. AVOID THEM.

6 Q. DID YOU EXPLAIN WHY THESE BONDS SHOULD BE
7 AVOIDED?

8 A. YES.

9 Q. WHAT DID YOU SAY?

10 A. THEY WERE JUNK BONDS.

11 Q. WHAT ELSE DID YOU SAY?

12 A. I SAID THAT I FELT THAT IN ORDER FOR THIS
13 PROPERTY TO BREAK EVEN, IT WOULD HAVE TO GENERATE
14 A CASINO WIN -- A WIN SUBSTANTIALLY IN EXCESS OF
15 ANY CASINO WIN EVER, THAT I HAD SERIOUS
16 RESERVATIONS ABOUT THAT.

17 Q. WHAT DO YOU MEAN SERIOUS RESERVATIONS?

18 A. WELL, WHEN THIS PROPERTY WAS ABOUT TO OPEN,
19 I WAS WORRIED ABOUT THE ECONOMY.

20 Q. TWO ANSWERS AGO WHEN YOU SAID YOU HAD
21 SERIOUS RESERVATIONS, DID YOU MEAN THAT YOU DIDN'T
22 BELIEVE THAT THE CASINO WOULD BREAK EVEN?

23 A. THAT'S CORRECT.

24 Q. DID YOU BELIEVE THAT DEBT SERVICE WOULD BE
25 COVERED BY CASH FLOW, BY INTERNALLY GENERATED CASH

1 A. I THINK HE WAS WITH RAYMOND JAMES.

2 Q. IN WHAT CITY?

3 A. SAINT PETERSBURG, FLORIDA.

4 Q. DO YOU KNOW WHERE HE IS NOW?

5 A. NO.

6 Q. VAN LEE, WHERE WAS HE?

7 A. DAN.

8 Q. DAN, EXCUSE ME.

9 A. HE WAS WITH DREXEL BURNHAM.

10 Q. DO YOU KNOW WHERE HE IS NOW?

11 A. FIRST BOSTON.

12 Q. AND LEE ISKER, DO YOU KNOW WHERE HE WAS IN
13 1988?

14 A. PAINE WEBBER.

15 Q. DO YOU KNOW WHERE HE IS NOW?

16 A. WITH A SMALL BOUTIQUE IN SAN FRANCISCO, BUT
17 I CAN'T REMEMBER THE NAME.

18 Q. IS VOGEL STILL WITH MERRILL-LYNCH?

19 A. TO MY KNOWLEDGE.

20 MR. COLLINS: I HAVE NO FURTHER
21 QUESTIONS AT THIS TIME AND I THANK YOU.

22 MR. BRADY: I JUST HAVE A FEW.

23 (EXAMINATION OF MR. ROFFMAN BY MR. BRADY:)

24 Q. HAVE YOU EVER MET A LAWYER NAMED STEWART
25 WEXLER?

ROFFMAN - BRADY

1 A. I'VE TALKED TO HIM.

2 Q. DO YOU RECALL HOW MANY TIMES?

3 A. NO.

4 Q. DO YOU RECALL WHEN?

5 A. DURING 1990.

6 Q. COULD YOU TELL ME WHAT YOU REMEMBER ABOUT
7 THE CONVERSATION?

8 (OBJECTION) MR. COLLINS: I OBJECT. GO AHEAD.

9 THE WITNESS: HE WANTED TO HAVE ME
10 READ THE TRUMP TAJ MAHAL PROSPECTUS TO SEE IF I
11 COULD FIND SOMETHING IN THERE THAT MIGHT BE ABLE
12 TO GET THE PEOPLE WHO WROTE IT IN TROUBLE.

13 BY MR. BRADY:

14 Q. DID YOU AGREE TO DO THAT?

15 A. NO.

16 Q. DID YOU EVER DISCUSS WITH MR. WEXLER ANY
17 KIND OF CONVERSATIONS YOU HAD WITH DONALD TRUMP?

18 A. I DON'T REMEMBER.

19 Q. DO YOU RECALL IF YOU EVER TOLD MR. WEXLER
20 YOU WERE BARRED FROM EXPRESSING ANY OPINIONS TO
21 HIM BECAUSE OF AN AGREEMENT YOU HAD WITH DONALD
22 TRUMP?

23 A. NO.

24 Q. NO YOU DON'T RECALL THAT OR NO YOU DIDN'T
25 SAY THAT?